

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

Raheem Jones,)	
)	
Plaintiff,)	
)	
v.)	CASE NO. _____
)	
Equifax and Experian,)	
)	
Defendants.)	
_____)	

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1441 *et seq.*, Defendant Experian Information Solutions, Inc., erroneously sued as “Experian” (hereinafter “Experian”), by and through its undersigned counsel, and with the express consent of all Defendants served to date, hereby files this Notice of Removal of the above-captioned action to this Court and states as follows:

1. Experian and Equifax are named as Defendants in Civil Action No. 23-A-192 filed by Plaintiff Raheem Jones (“Plaintiff”) in the State Court of Cobb County for the State of Georgia (the “State Court Action”).
2. The Complaint in the State Court Action was filed on January 23, 2023.
3. Experian was served with Plaintiff’s Complaint on January 26, 2023. Upon information and belief, Equifax was served on January 24, 2023.

4. This Notice is being filed with this Court within thirty (30) days after Experian received a copy of Plaintiff's initial pleading setting forth the claims for relief upon which Plaintiff's action is based.

5. This Notice is also being filed with this Court within thirty (30) days after Equifax received a copy of Plaintiff's initial pleading setting forth the claims for relief upon which Plaintiff's action is based.

6. This Court is the proper district court for removal because the State Court Action is pending within this district.

7. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon Experian and Equifax in the State Court Action is attached hereto as Exhibit A.

8. Experian is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Experian uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a "consumer reporting agency" within the meaning of 15 U.S.C. § 1681a(f). Upon information and belief, Equifax is also a "consumer reporting agency" within the meaning of 15 U.S.C. § 1681a(f).

9. On information and belief, the claims for relief against Experian and Equifax alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681 *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

10. Counsel for Equifax expressly represented to counsel for Experian that Equifax consents to removal of the above-captioned action to this Court and has given Experian express permission to represent that Equifax consents to removal.

11. Promptly after the filing of this Notice of Removal, Experian shall provide notice of the removal to Plaintiff, and shall file a copy of this Notice with the clerk of the Court in the State Court Action, as required by 28 U.S.C. § 1446(d).

RESPECTFULLY SUBMITTED, this the 23rd day of February, 2023.

/s/ Jodi L. Kalson
Jodi L. Kalson
Attorney Bar No.: 184730
Jones Day
1221 Peachtree Street N.E., Suite 400
Atlanta, GA 30361
Telephone: 404.581.8822
E-mail: jkalson@jonesday.com

*Attorney for Defendant
Experian Information Solutions, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2023, I electronically filed the foregoing document. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties, listed below, will be served by first-class, United States Mail, postage prepaid, and electronic mail. Parties may access this filing through the Court's electronic filing system.

Raheem Jones (Pro se)
87 Wedge Wood Way
Dallas, GA 30132
mr.raheemjones@yahoo.com

Theodore E. Roethke
Seyfarth Shaw LLP
1075 Peachtree Street, N.E., Suite 2500
Atlanta, GA 30309-3958
404.704-9625
troethke@seyfarth.com

Counsel for Equifax

/s/ Jodi L. Kalson
Jodi L. Kalson

EXHIBIT A

General Civil and Domestic Relations Case Filing Information Form

☐ Superior or ☐ State Court of Cobb County

For Clerk Use Only

Date Filed _____
MM-DD-YYYYCase Number 23-A-192

Plaintiff(s)

<u>Gunes Raheem</u>				
Last	First	Middle L	Suffix	Prefix
<u>Dones Raheem</u>				
Last	First	Middle L	Suffix	Prefix

_____	_____	_____	_____	_____
Last	First	Middle L	Suffix	Prefix

_____	_____	_____	_____	_____
Last	First	Middle L	Suffix	Prefix

Defendant(s)

<u>Egurtay</u>				
Last	First	Middle L	Suffix	Prefix
<u>Experian</u>				
Last	First	Middle L	Suffix	Prefix

_____	_____	_____	_____	_____
Last	First	Middle L	Suffix	Prefix

_____	_____	_____	_____	_____
Last	First	Middle L	Suffix	Prefix

Plaintiff's Attorney _____

Bar Number _____

Self-Represented ☒

Check one case type and one sub-type in the same box (if a sub-type applies):

General Civil Cases

- ☐ Automobile Tort
- ☐ Civil Appeal
- ☐ Contempt/Modification/Other Post-Judgment
- ☐ Contract
- ☐ Garnishment
- ☐ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☒ Other General Civil

Domestic Relations Cases

- ☐ Adoption
- ☐ Contempt
- ☐ Non-payment of child support, medical support, or alimony
- ☐ Dissolution/Divorce/Separate Maintenance/Alimony
- ☐ Family Violence Petition
- ☐ Modification
- ☐ Custody/Parenting Time/Visitation
- ☐ Paternity/Legitimation
- ☐ Support - IV-D
- ☐ Support-Private (non-IV-D)
- ☐ Other Domestic Relations

COBB COUNTY, GA
FILED IN OFFICE
2023 JAN 23 PM 12:07
JUDICIAL CLERK
STATE COURT CLERK-02



Check if the action is related to another action pending or previously pending in this court involving some or all of the same: parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number _____

Case Number _____



I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.



Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required _____



Do you or your client need any disability accommodations? If so, please describe the accommodation request.

IN THE STATE COURT OF COBB COUNTY
STATE OF GEORGIA

Raheem G. P. [Signature]
87 Wedge wood way
Dallas, GA. 30132
 PLAINTIFF

Vs

Experian
475 Anton Blvd
Costa Mesa, Ca 92626
 DEFENDANT

CASE NO. 23A 112

TYPE OF SUIT:	AMOUNT OF SUIT
Account <input type="checkbox"/>	Principal \$ _____
Contract <input type="checkbox"/>	Interest \$ _____
Note <input type="checkbox"/>	Attys. Fees \$ _____
Tort <input type="checkbox"/>	Court Costs \$ _____

SUMMONS


TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the CLERK of said court and serve upon the Plaintiff's attorney or upon Plaintiff if no attorney, to wit, whose name and address is:

COBB COUNTY, GA
 FILED IN OFFICE
 2023 JAN 23 PM 12:07
 ROBIN L. BISHOP
 STATE COURT CLERK-02

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. NOTE: Any corporate party served must be represented by a licensed attorney at law. (see Eckles v. Atlanta Technology Group, 267 Ga. 801)

This January 23, 2023
 (Date)


Robin L. Bishop
 Clerk
 State Court of Cobb County

12 East Park Square, Marietta, Georgia 30090-9630

(770) 528-1220

Building B, First floor-Civil Division

IN THE STATE COURT OF COBB COUNTY
STATE OF GEORGIA

Raheem Jones
87 Wedge Wood way
Douglas GA 30132
PLAINTIFF

Vs

Equifax
1550 Peachtree St. ne
Atlanta, GA. 30309
DEFENDANT

CASE NO. 23A192

TYPE OF SUIT:	AMOUNT OF SUIT
Account <input type="checkbox"/>	Principal \$ _____
Contract <input type="checkbox"/>	Interest \$ _____
Note <input type="checkbox"/>	Attys. Fees \$ _____
Tort <input type="checkbox"/>	Court Costs \$ _____

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the CLERK of said court and serve upon the Plaintiff's attorney or upon Plaintiff if no attorney, to wit, whose name and address is:

COBB COUNTY, GA
 FILED IN OFFICE
 2023 JAN 23 PM 12:07
 ROBIN L. BISHOP
 STATE COURT CLERK-02

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. NOTE: Any corporate party served must be represented by a licensed attorney at law. (see Eckles v. Atlanta Technology Group, 267 Ga. 801)

This January 23, 2023
(Date)

Robin L. Bishop
Clerk
State Court of Cobb County

12 East Park Square, Marietta, Georgia 30090-9630 (770) 528-1220

Building B, First floor-Civil Division

To whom it may concern;

My name is Raheem Jones, I am demanding \$1000 per item in damages be paid to myself for reporting the following fraudulent accounts being reported by your company totaling \$5000 combined. I am demanding this payment and removal of all fraudulent accounts below.

Also I am demand \$500,000 in damages for several inaccuracies being reported such as this address reporting on my credit report; 1300 Squibb Drive Johnson City Tn 37601-5099.

Information on several bureaus are reporting incorrect data.

I have sent you several police reports detailing my case. Additionally, I have sent you several Federal Trade Commission reports with the following items marked and notified documentation as fraud. You are still reporting these fraudulent items below.

Comenity Capital/ Zales: Acct# Unknown

Balance \$2715

NAVY FEDERAL CR UNION : 8XXXXX

Balance\$27,604

Balance updatedDec 31, 2022

AMEX/CBNA acct number 377481XXXXXXXXXX

Balance\$347

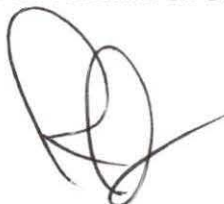
Balance updatedJan 05, 2023

NAVY FEDERAL CR : Account number872220X

Balance\$10,528

Balance updatedDec 31, 2022

NAVY FEDERAL CR UNION: Acct 612195X



COBB COUNTY, GA
FILED IN OFFICE
2023 JAN 23 PM 12:07
JUDITH A. BISHOP
STATE COURT CLERK-02

Balance\$3,615

Balance updatedDec 31, 2022

NAVY FEDERAL CR UNION: Acct XXXX

Balance\$10,528

Balance updatedJul 05, 2022

TD BANK USA/TARGETCRED : Acct **585975XXXXXXXXXX**

Balance\$711

Balance updatedMar 05, 2021

Raheem Jones

EXHIBIT B

JS44 (Rev. 10/2020 NDGA)

CIVIL COVER SHEET

The JS44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

I. (a) PLAINTIFF(S)

Raheem Jones

DEFENDANT(S)

Experian Information Solutions, Inc.
(incorrectly identified as "Experian" in Plaintiff's Complaint)

Equifax Information Services, LLC

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Paulding County
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)

Raheem Jones - Pro Se Plaintiff
87 Wedge Wood Way
Dallas, GA 30132
404-735-2865 email: mr.raheemjones@yahoo.com

ATTORNEYS (IF KNOWN)

Jodi L. Kalson - Jones Day (Atlanta)
jkalson@jonesday.com
1221 Peachtree St. NE Suite 400 - Atlanta, GA
(counsel for Experian Information Solutions, Inc.)

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. GOVERNMENT PLAINTIFF
☐ 2 U.S. GOVERNMENT DEFENDANT
☒ 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY)
☐ 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) (FOR DIVERSITY CASES ONLY)

- | PLF | DEF | PLF | DEF | |
|----------------------------|----------------------------|----------------------------|----------------------------|---|
| <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE |
| <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 | INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE |
| <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 | FOREIGN NATION |
- CITIZEN OF THIS STATE
CITIZEN OF ANOTHER STATE
CITIZEN OR SUBJECT OF A FOREIGN COUNTRY

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 ORIGINAL PROCEEDING
☒ 2 REMOVED FROM STATE COURT
☐ 3 REMANDED FROM APPELLATE COURT
☐ 4 REINSTATED OR REOPENED
☐ 5 TRANSFERRED FROM ANOTHER DISTRICT (Specify District)
☐ 6 MULTIDISTRICT LITIGATION - TRANSFER
☐ 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT
☐ 8 MULTIDISTRICT LITIGATION - DIRECT FILE

V. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

15 U.S.C. §§ 1681, et. seq.

Fair Credit Reporting Act

(IF COMPLEX, CHECK REASON BELOW)

- | | |
|---|---|
| <input type="checkbox"/> 1. Unusually large number of parties. | <input type="checkbox"/> 6. Problems locating or preserving evidence |
| <input type="checkbox"/> 2. Unusually large number of claims or defenses. | <input type="checkbox"/> 7. Pending parallel investigations or actions by government. |
| <input type="checkbox"/> 3. Factual issues are exceptionally complex | <input type="checkbox"/> 8. Multiple use of experts. |
| <input type="checkbox"/> 4. Greater than normal volume of evidence. | <input type="checkbox"/> 9. Need for discovery outside United States boundaries. |
| <input type="checkbox"/> 5. Extended discovery period is needed. | <input type="checkbox"/> 10. Existence of highly technical issues and proof. |

CONTINUED ON REVERSE**FOR OFFICE USE ONLY**

RECEIPT # _____	AMOUNT \$ _____	APPLYING IFP _____	MAG JUDGE (IFP) _____
JUDGE _____	MAG JUDGE _____ (Referral)	NATURE OF SUIT _____	CAUSE OF ACTION _____

VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)**CONTRACT - "0" MONTHS DISCOVERY TRACK**

- ☐ 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
- ☐ 152 RECOVERY OF DEFAULTED STUDENT LOANS (Excl. Veterans)
- ☐ 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

- ☐ 110 INSURANCE
- ☐ 120 MARINE
- ☐ 130 MILLER ACT
- ☐ 140 NEGOTIABLE INSTRUMENT
- ☐ 151 MEDICARE ACT
- ☐ 160 STOCKHOLDERS' SUITS
- ☐ 190 OTHER CONTRACT
- ☐ 195 CONTRACT PRODUCT LIABILITY
- ☐ 196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- ☐ 210 LAND CONDEMNATION
- ☐ 220 FORECLOSURE
- ☐ 230 RENT LEASE & EJECTMENT
- ☐ 240 TORTS TO LAND
- ☐ 245 TORT PRODUCT LIABILITY
- ☐ 290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

- ☐ 310 AIRPLANE
- ☐ 315 AIRPLANE PRODUCT LIABILITY
- ☐ 320 ASSAULT, LIBEL & SLANDER
- ☐ 330 FEDERAL EMPLOYERS' LIABILITY
- ☐ 340 MARINE
- ☐ 345 MARINE PRODUCT LIABILITY
- ☐ 350 MOTOR VEHICLE
- ☐ 355 MOTOR VEHICLE PRODUCT LIABILITY
- ☐ 360 OTHER PERSONAL INJURY
- ☐ 362 PERSONAL INJURY - MEDICAL MALPRACTICE
- ☐ 365 PERSONAL INJURY - PRODUCT LIABILITY
- ☐ 367 PERSONAL INJURY - HEALTH CARE/ PHARMACEUTICAL PRODUCT LIABILITY
- ☐ 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- ☐ 370 OTHER FRAUD
- ☐ 371 TRUTH IN LENDING
- ☐ 380 OTHER PERSONAL PROPERTY DAMAGE
- ☐ 385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

- ☐ 422 APPEAL 28 USC 158
- ☐ 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

- ☐ 440 OTHER CIVIL RIGHTS
- ☐ 441 VOTING
- ☐ 442 EMPLOYMENT
- ☐ 443 HOUSING/ ACCOMMODATIONS
- ☐ 445 AMERICANS with DISABILITIES - Employment
- ☐ 446 AMERICANS with DISABILITIES - Other
- ☐ 448 EDUCATION

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- ☐ 462 NATURALIZATION APPLICATION
- ☐ 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- ☐ 463 HABEAS CORPUS- Alien Detainee
- ☐ 510 MOTIONS TO VACATE SENTENCE
- ☐ 530 HABEAS CORPUS
- ☐ 535 HABEAS CORPUS DEATH PENALTY
- ☐ 540 MANDAMUS & OTHER
- ☐ 550 CIVIL RIGHTS - Filed Pro se
- ☐ 555 PRISON CONDITION(S) - Filed Pro se
- ☐ 560 CIVIL DETAINEE: CONDITIONS OF CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

- ☐ 550 CIVIL RIGHTS - Filed by Counsel
- ☐ 555 PRISON CONDITION(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- ☐ 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881
- ☐ 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- ☐ 710 FAIR LABOR STANDARDS ACT
- ☐ 720 LABOR/MGMT. RELATIONS
- ☐ 740 RAILWAY LABOR ACT
- ☐ 751 FAMILY and MEDICAL LEAVE ACT
- ☐ 790 OTHER LABOR LITIGATION
- ☐ 791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

- ☐ 820 COPYRIGHTS
- ☐ 840 TRADEMARK
- ☐ 880 DEFEND TRADE SECRETS ACT OF 2016 (DTSA)

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- ☐ 830 PATENT
- ☐ 835 PATENT-ABBREVIATED NEW DRUG APPLICATIONS (ANDA) - a/k/a Hatch-Waxman cases

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- ☐ 861 HIA (1395f)
- ☐ 862 BLACK LUNG (923)
- ☐ 863 DIWC (405(g))
- ☐ 863 DIWW (405(g))
- ☐ 864 SSD TITLE XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

- ☐ 870 TAXES (U.S. Plaintiff or Defendant)
- ☐ 871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- ☐ 375 FALSE CLAIMS ACT
- ☐ 376 Qui Tam 31 USC 3729(a)
- ☐ 400 STATE REAPPORTIONMENT
- ☐ 430 BANKS AND BANKING
- ☐ 450 COMMERCE/ICC RATES/ETC.
- ☐ 460 DEPORTATION
- ☐ 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- ☒ 480 CONSUMER CREDIT
- ☐ 485 TELEPHONE CONSUMER PROTECTION ACT
- ☐ 490 CABLE/SATELLITE TV
- ☐ 890 OTHER STATUTORY ACTIONS
- ☐ 891 AGRICULTURAL ACTS
- ☐ 893 ENVIRONMENTAL MATTERS
- ☐ 895 FREEDOM OF INFORMATION ACT 899
- ☐ 899 ADMINISTRATIVE PROCEDURES ACT / REVIEW OR APPEAL OF AGENCY DECISION
- ☐ 950 CONSTITUTIONALITY OF STATE STATUTES

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- ☐ 410 ANTITRUST
- ☐ 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- ☐ 896 ARBITRATION (Confirm / Vacate / Order / Modify)

*** PLEASE NOTE DISCOVERY TRACK FOR EACH CASE TYPE. SEE LOCAL RULE 26.3**

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$ _____

JURY DEMAND ☐ YES ☒ NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

VIII. RELATED/REFILED CASE(S) IF ANY

JUDGE _____ DOCKET NO. _____

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- ☐ 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
- ☐ 5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
- ☐ 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

- ☐ 7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. _____, WHICH WAS DISMISSED. This case ☐ IS ☐ IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.

Jodi Kalson
SIGNATURE OF ATTORNEY OF RECORD

2/23/23
DATE